Department of Agriculture, Trade and Consumer Protection Rod Nilsestuen, Secretary

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Subject: Hidden costs of managing pesticides and other chemicals at schools

Many school districts use year-end fund balances to purchase supplies that can be stored for future use. If pesticides or other chemical products are part of your purchasing plans, I'd like to offer some considerations and suggestions as a hazardous materials manager and as Wisconsin's School Integrated Pest Management program coordinator.

During a visit to one relatively small district office, there were several hundred containers of insecticide, shelved in storage. The explanation given was that this inventory was the result of a one-time purchase to use year-end money, counting on the insecticide retaining its shelf-life for many years so it could be used as needed over a long period of time. Don't allow your school to follow this short-sighted thinking.

Purchasing chemicals might seem like a logical investment so your district doesn't forfeit equipment or supply monies. But, managing a stagnant chemical product inventory costs your school real money. The full life-cycle cost* of a chemical product can be up to 160 percent of its purchase price. This includes all the management that goes into having and using it.

Every product containing a hazardous substance that enters your school, must be actively managed. This requires the school meet certain rules and regulations and to address safety issues. This includes most products that are purchased over the counter.

Depending on the contents, a product in storage will fall under a number of regulatory requirements for storage, record keeping, and reporting. Safety, environmental and health regulations for pesticides are enforced by the Wisconsin Department of Agriculture, Trade and Consumer Protection and the federal Environmental Protection Agency. Again, depending on their contents, chemical products are also covered by the Hazard Communication Standard, Community Right to Know Law, Clean Water Act's Pollution Prevention rules, and local fire protection standards. Schools must also train staff who might respond to an in-house chemical spill.

As a hazardous materials manager, I have seen situations where shelves of chemical products have broken and containers shattered, forming incompatible, toxic mixtures, and the damage caused when aerosol cans and compressed gasses became dangerous projectiles during a fire.

I know situations of costly disposal of out-dated chemical inventories that have become unstable and reactive or where containers degraded to the point where they cannot be safely moved without a professional contractor's services. Occasionally, EPA will cancel or recall a pesticide for safety reasons. The school must then consider disposal options of unused inventories and perhaps invest in new product to control a pest problem later on.

No matter the commodity, management of unnecessary inventories takes someone's time, which diverts efforts away from other school needs. Storage space can cost money, too. When a chemical inventory is indefinitely idle, it exploits storage space that could be used for other more immediate needs, including non-chemical items that might be purchased in quantity for a volume discount. Don't forget there is a cost to heat or cool spaces where temperature-sensitive products, such as pesticide aerosol cans, are stored.

There are better ways for schools to cushion future needs of supplies and equipment than chemical product purchases. In the case of pest management, consider purchasing hardware to repair door sweeps, screens and close other pest entrances to the buildings. These not only preclude pest entry into the school buildings, they save energy costs and do not have the regulatory overburden that most chemicals do. Monitoring stations that show if an area has an insect or rodent problem cost pennies per week, do not have pesticides in them and won't expire if they sit on the shelf for a while. Caulk, wire mesh, a flashlight, ladder, inspection mirror are all effective, versatile tools that can be put to use for pest management and other facilities management activities. These are all components of an Integrated Pest Management program that exercises prevention and least-risk solutions for pest problems.

School risk management requires anticipation and prevention. Determining your needs to control future problems can be simplified by careful consideration of tools that serve multiple purposes and are not a burden to manage. Integrated Pest Management is a program that works using these principles. For more information or assistance on a particular pest problem, please contact the Wisconsin Department of Agriculture, Trade and Consumer Protection 608-224-4547 or check our website at http://datcp.state.wi.us/arm/agriculture/pest-fert/pesticides/school_ipm.html.

^{*} American Chemical Society, 2002: Less is Better